

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

Cr. No. 24-10173-DJC

(1) REGINEL CAZARES a/k/a “Junior,”  
(2) LUIS RAMON FELIZ SANTANA a/k/a  
“Luis Feliz” a/k/a “Michael Corleone,”  
(3) CESAR PARRA a/k/a “Flow,”  
(4) JESUS LOPEZ MEDINA,

Defendants

JOINT INTERIM STATUS REPORT

On June 13, 2024, a grand jury returned an indictment charging defendants Cazares, Feliz Santana, and Lopez Medina with one count of Conspiracy to Distribute and to Possess with Intent to Distribute Controlled Substances, in violation of 21 U.S.C. § 846 (Count One); and charging all defendants with Money Laundering Conspiracy, in violation of 18 U.S.C. § 1956(h) (Count Two). Defendants Feliz Santana and Lopez Medina are detained. Defendants Cazares and Parra are released on conditions.

Pursuant to Local Rule 116.5(b), the parties submit the following joint status report.

**1. Automatic Discovery and Discovery Requests**

The government provided initial automatic discovery on July 25, 2024. The government provided additional discovery on August 13, 2024. Defendant Luis Felix recently retained new counsel, Eduardo Masferrer, who requires time to review the discovery. All defendants seek additional time to review discovery as well.

**2. Timing of Additional Discovery**

The government will provide any additional exculpatory information as provided by the Local Rules.

**3. Timing of Additional Discovery Requests**

Defendants reserve the right to make discovery requests upon complete review of discovery produced to-date.

**4. Protective Orders**

No party has filed for a motion for a protective order.

**5. Pretrial Motions**

The defendants have not filed any pretrial motions under Fed. R. Crim. P. 12(b). They reserve the right to file after complete review of discovery.

**6. Timing of Expert Disclosures**

The Court has not yet established a date for expert witness disclosures. The government will provide expert disclosures as required by Rule 16.

**7. Defenses**

The defendants need additional time to review discovery before deciding whether they intend to raise any affirmative defenses to the present charges.

**8. Excludable Delay**

Zero days of non-excludable time have accrued and 70 days will remain under the Act in which the case must be tried.

**9. Plea Discussions, Trial**

The parties have engaged in some plea negotiations. Any trial is anticipated to last 6-7 days.

**10. Timing of Interim Status Conference**

In the government's view, the Court may wish to proceed with the conference scheduled for November 18, 2024, to discuss the schedule for the case going forward. The defendants seek additional time. The parties jointly request that any Speedy Trial Act time be excluded from November 18, 2024, until any further status conference that the Court schedules.

Respectfully submitted,

JOSHUA S. LEVY  
Acting United States Attorney

By: /s/ Samuel R. Feldman  
Samuel R. Feldman  
Assistant United States Attorney  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants .

/s/ Samuel R. Feldman

Samuel R. Feldman

Assistant United States Attorney

Date: November 12, 2024